

Applicant(s): Tony Hollings et al.  
U.S.S.N.: 10/563,639

### **REMARKS**

In response to the Office action mailed February 9, 2009, Applicants respectfully request reconsideration. For the reasons set forth below, the application as presented is believed to be in allowable condition.

Claims 1 and 3 are amended herein. Claims 12-14, 16, 35, 40-44 and 49-51 were previously canceled. Claims 2, 8-11, 17-20, 23-34, 36-39, 45-48 and 52-56 were withdrawn from consideration. Accordingly, claims 1, 3-7, 15, 21, 22 and 57 stand pending, of which claims 1 and 21 are in independent form.

### **Specification**

Applicants have provided an Abstract as suggested by the Examiner in the Office Action.

Applicants have amended the specification to include section headings as suggested by the Examiner in the Office Action.

Applicants have amended the title as suggested by the Examiner in the Office Action. Reconsideration of the objection of the specification is respectfully requested.

### **Claim Objections**

Claims 1 and 3 are amended herein to cure the informalities identified by the Examiner in the Office Action. Reconsideration is respectfully requested.

### **Rejection of Claims Under 35 U.S.C. §103**

In the Office Action, claims 1, 3-7, 15, 21, 22 and 57 are rejected under 35 U.S.C. §103(a) as being obvious and unpatentable over Takahashi (U.S. Patent Application Publication No. 2001/0037743 A1) in view of Hoge (U.S. Patent No. 5,540,149).

Takahashi discloses a printing press having a fixed bearing wall (1d) that supports blanket cylinders (3a, 3b) and plate cylinders (4a, 4b) of printing units (2a, 2b, 2c, 2d). Inking means (6a, 6b) of the printing units (2a, 2b, 2c, 2d) are supported by movable bearing walls (10a, 10b), which are movable toward and away from the fixed bearing wall (1d). The Examiner correctly observes that Takahashi fails to teach means for moving the primary

module out from between the secondary modules when the secondary modules are in their non-operative positions and separated from the primary module to enable a second primary module, having a plurality of printing couple pairs in which the plate and blanket cylinders are of a different diameter than the diameter of the plate cylinders of the original primary module, to take the place of the original module. In fact, Takahashi teaches away from this concept in that he discloses a fixed bearing wall (1d) designed to permanently secure the rotatable blanket and plate cylinders (3a, 3b, 4a, 4b).

Hoge appears to disclose an arrangement in which a primary module or cassette (12) contains a single print couple pair (14, 16) that is positioned below an inker 20. An upper portion (4) of a tower (2) containing the inker (2) can be raised or lowered to accommodate different cassettes (12), which can be interchanged with one another. It is disclosed in Hoge that the cassettes (12) may have print couple pairs having differing diameters. The upper module is moveable in a vertical direction towards or away from the primary module.

Thus, in order to change a printed image cut off with the printing press disclosed in Takahashi, all the cylinders of the primary module must be replaced with cylinders of a different diameter, as proposed in claim 1, through the replacement of the entire primary module. In Hoge, which discloses a printing press having a completely different construction than Takahashi, the replacement of a single print couple is disclosed. A person having ordinary skill in the art is only led by Hoge to replace individual print couples, not to change the entire primary module. However, the construction of the printing press in Takahashi would prevent this modification since the blanket and plate cylinders are fixed within the permanent frame.

In addition, although Hoge suggests that a module carrying a single print couple pair may be moved and replaced with another module carrying a single print couple pair does not imply that this would also be possible with a printing unit having a plurality of printing couple pairs which is considerably heavier and much harder to move and support. Notably, the primary module of Applicants' invention comprising several print couple pairs may have a weight in excess of 55 tons, and cannot easily be supported on a module positioned beneath it, nor easily lifted into an elevated position to enable it to be inserted between upper and lower modules. In Hoge, the module carrying a single print couple pair is inevitably much

lighter and rests upon, and is supported by, the lower module. Therefore, although the prior art may teach that it is possible to move a module carrying a single printing couple pair, there is no teaching in Hoge to suggest that this is possible with a module carrying a plurality of printing couple pairs. In fact, a person skilled in the art is lead away from the invention by Hoge because he suggests a press orientation that a skilled person would consider to be very difficult to achieve with a much heavier primary module, i.e., an orientation in which the primary module is located above, and on, one of the secondary modules.

Moreover, the printing press disclosed in Hoge has an entirely different configuration to the printing press disclosed in Takahashi. Thus, these references are inherently incompatible with one another and so vastly different to each other to the extent that, even if a person having ordinary skill in the art was to attempt to combine the disclosure in each document, such a person would be unable to modify the printing press in Takahashi so as to arrive at a press in which the primary module carrying multiple print couple pairs, slides out from between a pair of laterally slideable secondary modules, in light of teaching in Hoge.

Further, a person having ordinary skill in the art would not be motivated to move the primary module in Takahashi in that Takahashi discloses a press having a rigid, fixed framework (1) and that side walls (1d), between which the blanket and plate cylinders (3a, 3b, 4a, 4b) are mounted, forms an integral part of this fixed framework (1). More specifically, the framework (1) comprises a platform (1a), two pairs of vertical framing members (1b, 1c) extending upwardly from opposite ends of the platform (1a) and a first pair of tie beams (1e) extending between the vertical framing member (1b) and the side walls (1d), and a second pair of tie beams (1f) between the vertical framing member (1c) and the side walls (1d). Thus, the side walls (1d) are securely fixed both to the platform (1a) and to rigid tie beams (1e, 1f), and so actually form part of the integral framework of the printing press. *See* Takahashi, Figure 1 and Paragraph [0031].

In contrast, with the movable bearing walls (10a, 10b) that support the inking means (6a, 6b), and which clearly do not form part of the integral framework (1) of the printing press but which are actually supported by the framework (1), including the side walls (1d), so as to be movable relative thereto towards and away from the side walls (1d). Therefore, it cannot be assumed that a skilled person would modify or attempt to modify the press of

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Takahashi so as to make the cylinder module slide out from between the inking modules, as this would require a fundamental and complete redesign of the press so that the side walls (1d) no longer form part of the integral fixed framework (1) of the printing press but are also slideable in a similar fashion to the moveable bearing walls (10a, 10b). Not only would this require a complete redesign and reconfiguring of the press to the side walls (1d) between which the plate and blanket cylinders are held but also to the entire framework (1) of the press, including removal of the tie-beams (1e, 1f) that rigidly secure the bearing walls (1d) to the rest of the framework, as well as redesign of the platform (1a).

Accordingly, based on the foregoing, reconsideration of the rejection of claim 1 is respectfully requested.

Claims 3-7, 15 and 57, which depend directly or indirectly from claim 1, are submitted as being patentable for the same reasons given for claim 1.

Claim 21 is directed to subject matter similar to the subject matter set forth in claim 1 and is therefore submitted as being patentable for the same reasons given for claim 1.

Claim 22, which depends from claim 21, is submitted as being patentable for the same reasons given for claim 21.

### CONCLUSION

In view of the foregoing, consideration and favorable action are respectfully requested. If the Examiner believes that the application is not in condition for allowance, or otherwise has any questions regarding the application, the Examiner is invited to contact the Applicants' Attorney at the telephone number provided below.

Respectfully submitted,

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